

# EXHIBIT B

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July 26, 2016

The Honorable Jesse M. Furman  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *In re: General Motors LLC Ignition Switch Litigation*,**  
14-MD-2543 (JMF);16-cv-0512 (JMF); 15-2844 (2d Cir.)

Dear Judge Furman:

I represent the *Elliott, Sesay, and Bledsoe* Plaintiffs, who are before the Court as Plaintiffs with non-consolidated complaints in MDL proceedings,14-md-2543, as joint appellants in pending appeals from the Bankruptcy Court,16-cv-0512, and as appellants in the related proceedings in the Second Circuit,15-2844.

Plaintiffs wish to correct yesterday's joint agenda letter, Doc. No. 3136, to inform the Court that they do not presently intend to move to withdraw the reference to the Bankruptcy Court. They agree with Lead Counsel's position that discovery related to whether Plaintiffs owning vehicles manufactured by Old GM with non-Delta ignition switch defects may assert successor liability claims should proceed in this Court.

Plaintiffs had requested that the status conference agenda letter notify that Court that Plaintiffs' counsel would be in attendance at the upcoming status conference and available to respond to any questions or concerns that the Court may have. Plaintiffs acted as Lead Appellants for all plaintiffs in the Second Circuit proceedings and were the exclusive appellate representatives for plaintiffs presenting non-Delta ignition switch claims relating to vehicles manufactured by Old GM. Plaintiffs objected to prior consolidated complaints because of the failure of Lead Counsel for the Economic Loss Plaintiffs to allege differentiated claims on behalf of plaintiffs and putative classes of owners of cars containing non-ignition switch defects. Dkt. No. 496, 1083. Plaintiffs notified the Court of the adversarial stance of leadership to Plaintiffs' efforts to protect the interests the owners of

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vehicles with non-ignition switch defects in the Bankruptcy Court and the Second Circuit proceedings. Dkt No. 2772. In such circumstances, Plaintiffs believe it advisable for counsel to attend the status hearing and to be available to speak to issues regarding future proceedings in light of this Court's recent ruling dismissing the "brand degradation" claims asserted in the Third Consolidated Amended Complaint and the in light of proceedings in the Second Circuit.

Plaintiffs agree with Lead Counsel's description of the impact of the Second Circuit's recent ruling on pending claims. They are troubled, however, by the implication that Lead Counsel does not intend to press the successor liability claims of many owners of vehicles manufactured and originally sold by Old GM containing non-ignition switch related defects. Plaintiffs allege and have reason to believe that Old GM knew about and suppressed information about many other defects in Old GM vehicles that had nothing to do with ignition switches besides the power steering and wire harness defects that leadership intends to pursue. Plaintiffs request that the Court direct Lead Counsel for economic loss plaintiffs to confer with non-leadership Plaintiffs' counsel in order to determine whether to assert such claims on a consolidated basis and/or whether to seek remand of any such claims if they will not be litigated in this forum.

Respectfully submitted,

*/s/ Gary Peller*

Gary Peller (*pro hac vice*)

cc: MDL Counsel of Record